REMARKS

Applicant and the undersigned are most grateful for the time and effort accorded the instant application by the Examiner. In the Office Action dated October 25, 2005 pending Claims 1-22 were rejected and the rejection made final. In response Applicant has filed herewith a Request for Continued Examination and has amended claims 1, 4, 6 and 8; added a new claim, claim 23 (which depends from claim 4); and canceled claim 3. Applicant intends no change in the scope of the claims by the changes made by this amendment. It should be noted these amendments are not in acquiescence of the Office's position on allowability of the claims, but merely to expedite prosecution.

Claims 1-22 were pending in the instant application at the time of the outstanding Office Action. Of these claims, claims 1, 4, 6, 10, 12-13, 15-17, 19-22 are independent claims; the remaining claims are dependent claims. All claims stand rejected 35 U.S.C. § 103(a) in view of Thielens et al. (hereafter "Thielens") in view of Stern et al. (hereafter "Stern") and further in View of WordPerfect Version 5.1 for DOS (hereafter "WordPerfect").

As the Examiner is assuredly aware, to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 there must be: (1) a suggestion or motivation to modify a reference or combine references; (2) a reasonable expectation of success in making the modification or combination; and (3) a teaching or suggestion to one skilled in the art of all the claimed limitations of the invention to which the art is applied. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). As will be addressed below, the

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present invention is not obviousness in view of the applied art, because all the necessary requirements have not been fully satisfied. Not only is there a lack of support for finding a motivation and expectation of success to make the combinations and modifications suggested by the Office, importantly, the cited art fails to teach or suggest the instant invention as presently claimed. The immediate withdrawal of the present rejections and notice of allowance is, therefore, respectfully requested.

The present invention broadly contemplates methods and systems that generally relate to markup text data error correction. In accordance with the present invention, errors and incorrect conversions that tend to occur during the re-input of text can be detected. Additional representative data can be added to the markup text data which represents and describes the data identified as being a source of error in future data text re-input. In accordance with the present invention, the additional representative data can be used to determine the original data that it represents, thus, enabling the prevention of common errors associated with markup text data re-input.

A very simply example related to the present invention and which is in no way intended to limit Applicant's disclosure and/or claims may prove to be a helpful overview of the Applicant's position. For example then, if "AB" were data that when re-input generally resulted as being interpreted "DE", then another way of representing "AB" that did not result in a misinterpretation would be helpful in preventing the re-input error. If, continuing this basic example, "12" could represent "AB" without any re-input errors being associated with "12", then the error could be avoided. The insertion of "12" into the data as an identification of "AB" would enable the prevention of the re-input error

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when used in a system that understood the additional data, "12", to mean "AB" is the proper form of the associated data being re-input. The relation of the example to at least one embodiment of the present invention can be seen in an embodiment in which, "A first computer comprises: a markup addition profile, which includes information used for replacing with tags a predetermined portion in XML application data; and an error prevention/detection/correction markup addition module, for replacing with tags, while referring to the markup addition profile, the predetermined portion of the application data, for generating and outputting application data that includes correction information. A second computer comprises: an error detection/correction module, for receiving the application data that includes correction information, for recognizing a tag set included in the data, and for detecting errors or incorrect conversions in the application data." (Abstract)

The cited art stands in contrast to the presently claimed invention. As best understood, Thielens appears to be directed to a copy editing apparatus and method. (Col. 1, lines 9-10) Copy editing as used in Thielens appears to refer to the process in which a manuscript copy is edited. As noted therein, such a process has traditionally been performed on paper, and certain conventions have emerged. (Col. 16, lines 33-36, "These correspond to the aforementioned markings that the copy editor normally marks adjacent, for example, the chapter headings, to indicate how they will print. These markings are conventionally contained within a circle.") Such copy edit markings may be inserted into an electronic document through the use of a "edit tags." (Col. 17, line 65 through Col. 18, line 20)

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Stern appears to be directed to a system and method for the automatic preparation and searching of scanned documents, such as microfilm and paper, in which the probability of errors occurring during the preparation of the scanned documents is incorporated into the searching process. (Paragraph 1). Such approaches are typically referred to as "fuzzy searches". As stated in Stern, "[t]he advantage of the present invention is that is specifically ties the 'fuzziness' of the search to the amount of error which occurs during the OCR process." (Paragraph 48)

Finally, as best understood, WordPerfect appears to be directed to a spell-checking tool for use in conjunction with WordPerfect, a word processor that creates textual documents in DOS. (The spell checker uses English language dictionaries unless specified. Algorithmic dictionaries may also be set as the dictionary to be used during spell-checking, but these dictionaries may not be modified or changed. Additionally, the spell check does not check words insides of any styles, and only considers words with uppercase or lowercase letters, as well as apostrophes and international letters if specified, as valid words. Parentheses are considered to be invalid characters.)

At least one embodiment of the instantly claimed invention requires, "An error correction support method for application data written in a markup description language, said method comprising the steps of: selecting, from elements of said application data written in a markup description language, a text portion that needs error correction support, said error correction related to errors comprising errors or incorrect character conversions that occur frequently during the re-input of text in a markup description language used to write data or sentences; enclosing said selected text portion using

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predetermined tags; and writing correction code, which is based on a predetermined algorithm, in said text portion enclosed by said predetermined tags, wherein the number of said errors or incorrect character conversions is ultimately reduced." (Claim 4) Preventing errors or incorrect character conversions in a markup description language as claimed is simply not taught or suggested by either Thielens, Stern, or WordPerfect. Moreover, combining the teachings of Thielens, Stern, and WordPerfect would not result in the instantly claimed invention.

Applicant would like to point out the subject matter of newly added claim 23 is also not taught or suggest by the cited art. Specifically, claim 23, which depends from claim 4 above, and recites, *inter alia,* "[r]emoving said correction code and said predetermined tags and returning said application data written in a markup description language to its original form." (Claim 23) None of the cited art references contemplate, teach, or suggest the invention as set forth in claim 23. Therefore, it, as well as the other claims, should be immediately allowed. Please also note the Examiner appears to have applied his rationale for the rejection of claims 1 and/or 4 to his rejection of independent claims 12, 13, 17, 19, and 21, which are, broadly speaking, directed toward the receiving and recognition of data including a correction code, which is different than that claimed in claims 1 and/or 4. For the reasons similar to those as set forth for claim 23, just described, the Applicant suggests that the cited art fails to teach the limitations for which it has been cited. (See Fig. 7 Ref. 23 "Error detection/correction module).

In view of the foregoing, it is respectfully submitted that Claims 1, 4, 6, 8, 10, 12-13, 15-17, 19-22 are fully distinguishable over the applied art and are thus allowable. By

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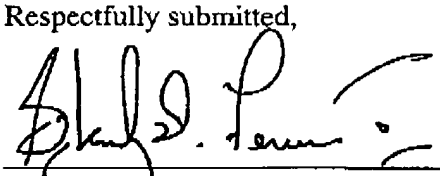
virtue of dependence from Claims 1, 4, 6, 8, 10, 13, and 17, it is thus also submitted that Claims 2, 5, 7, 9, 11, 14, 18, and 23 are also allowable at this juncture.

In view of the foregoing, it is respectfully submitted that Claims 1-2 and 4-23 fully distinguish over the applied art and are thus in condition for allowance. Notice to the effect is hereby earnestly solicited. If there are any further issues in this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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